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13				
14	UNITED STATES DISTRICT COURT			
15	CENTRAL DISTRICT OF CALIFORNIA			
16	ADAM RICHARDS, et al.,	Case No.: 8:23-cv-02413 JVS (KESx)		
17	Plaintiffs,	PLAINTIFFS' REQUEST FOR ENTRY OF JUDGMENT		
18	V.	PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 58(d)		
19	GAVIN NEWSOM, et al.,	Courtroom: 10C		
20	Defendants.	Judge: Hon. James V. Selna		
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REQUEST FOR ENTRY OF JUDGMENT

1	Pursuant to Federal Rule of Civil Procedure 58(d), Plaintiffs Adam Richards,		
2	Jeffrey Vandermeulen, Gerald Clark, Jesse Harris, On Target Indoor Shooting		
3	Range, LLC, Gaalswyk Enterprises, Inc., d/b/a Barrel Firearms, Gun Owners of		
4	California, Inc., Gun Owners of America, Inc., Gun Owners Foundation, California		
5	Rifle & Pistol Association, Incorporated and Second Amendment Foundation		
6	("Plaintiffs") submit this Request for Entry of Judgment as follows:		
7	1. On October 16, 2024, the Court granted Defendant Rob Bonta's motion		
8	to dismiss the amended complaint, dismissing all claims without prejudice and		
9	granting the Plaintiffs leave to amend on or before November 6, 2024.		
10	2. Plaintiffs chose to stand on their complaint and not to amend, and on		
11	November 12, 2024, Defendant filed a notice informing this Court that Plaintiffs had		
12	not filed an amended complaint by November 6, 2024.		
13	3. This Court's dismissal order, dispensing with every claim and prayer		
14	for relief, provides grounds for entry of judgment and no further action is necessary		
15	before the Court can enter judgment pursuant to Rule 58(a).		
16	4. For these reasons, Plaintiffs respectfully ask this Court to enter final		
17	judgment pursuant to Rule 58(d). A proposed judgment is attached hereto.		
18	Dated: January 27, 2025	MICHEL & ASSOCIATES, P.C.	
19		s/ Anna M. Barvir	
20		Anna M. Barvir Attorneys for Plaintiffs Adam Richards,	
21		Jeffrey Vandermeulen, Gerald Clark, Jesse Harris, On Target Indoor Shooting Range, LLC, Gaalswyk Enterprises, Inc. (D/B/A	
22		Smokin' Barrel Firearms), Gun Owners of California, Inc., Gun Owners of America, Inc.,	
23		Gun Owners Foundation, and California Rifle	
24		& Pistol Association, Incorporated	
25	Dated: January 27, 2025	LAW OFFICES OF DONALD KILMER, APC	
26		s/Donald Kilmer	
27		Donald Kilmer Attorney for Plaintiff The Second Amendment	
28		Foundation	
	2 REQUEST FOR ENTRY OF JUDGMENT		

ATTESTATION OF E-FILED SIGNATURES I, Anna M. Barvir, am the ECF User whose ID and password are being used to file this PLAINTIFFS' REQUEST FOR ENTRY OF JUDGMENT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 58(d). In compliance with Central District of California L.R. 5-4.3.4, I attest that all signatories are registered CM/ECF filers and have concurred in this filing. Dated: January 27, 2025 <u>s/ Anna M. Barvir</u> Anna M. Barvir REQUEST FOR ENTRY OF JUDGMENT

1 **CERTIFICATE OF SERVICE** IN THE UNITED STATES DISTRICT COURT 2 CENTRAL DISTRICT OF CALIFORNIA 3 Case Name: Richards, et al. v. Newsom, et al. 4 Case No.: 8:23-cv-02413 JVS (KESx) 5 IT IS HEREBY CERTIFIED THAT: 6 I, the undersigned, am a citizen of the United States and am at least eighteen 7 years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802. 8 I am not a party to the above-entitled action. I have caused service of: 9 PLAINTIFFS' REQUEST FOR ENTRY OF JUDGMENT PURSUANT TO 10 FEDERAL RULE OF CIVIL PROCEDURE 58(d) 11 on the following party by electronically filing the foregoing with the Clerk of the 12 District Court using its ECF System, which electronically notifies them: 13 Todd Grabarsky 14 Deputy Attorney General todd.grabarsky@doj.ca.gov 15 Carolyn Downs carolyn.downs@doj.ca.gov 16 Office of the Attorney General for California 17 300 South Spring Street, Suite 1702 Los Angeles, CA 90013 18 Telephone: (213) 269-6044 Attorneys for Defendants 19 20 I declare under penalty of perjury that the foregoing is true and correct. 21 Executed January 27, 2025. 22 23 24 25 26 27 28

CERTIFICATE OF SERVICE